PLACE CREATION

BCC DS
RECEIVED
01/10/2026
APPLICATION REF
A006964015

Our Ref: 20261001 – The GAP

2 October 2026

City Planning and Economic Development Services
Development Services
GPO Box 1434
Brisbane QLD 4001

Attn: Shirley Mills

Dear Shirley,
RE: RESPONSE TO SUBMISSIONS - A006964015 –MCU (DEVELOPMENT PERMIT FOR CHILD CARE CENTRE) OVER 1095 WATERWORKS ROAD, THE GAP.

Following the completion of public notification and submission of the Notice of Compliance by Development Signs it is noted that a total of six (6) submissions ere received in relation to the proposed child care centre. On behalf of the Applicant, Queensland Resources Holdings Pty Ltd, we provide a response to each of the items raised.

The submissions can be summarised as

- Inadequate onsite parking
- Lack of Demonstrated Community Need
- Residential amenity and privacy
- Location and design of bin storage areas
- Acoustic Impacts
- Safety of site access
- Fencing details
- Potential impacts on new construction on adjoining lots.
- Landscape and screening

These issues are addressed within this letter.

Parking

Concerns in relation to the provision of onsite parking are unwarranted as the development exceeds the required minimum parking rates set out in the *City Plan – Transport, access, parking and servicing planning scheme policy.*
The TAPS PSP requires 1 parking space per 5 child care places in accordance with *Table 14—Car parking standards in all other cases*

As a result of design amendments made in response to Councils Information Request, the number of child care places was reduced from 100 places to 94 places – without changing the 20 car parking spaces provided onsite.

- 20 spaces provided
- 19 spaces required.

Therefore, the site provides parking in excess of Councils requirement for a child care centre of this size.

By providing excess parking onsite it is considered that the potential of overflow parking from the site into neighbouring streets is greatly diminished and therefore is highly unlikely to increase congestion or exacerbate existing parking issues caused by The Gap State School, surrounding community facilities and local commercial activities.

Lack of Demonstrated Community Need for additional child care places.

A Needs Assessment has been prepared in support of the application which clearly identifies a demonstratable need for additional child care places for the local community. Please refer to the *Needs Assessment* as prepared by Business Geographics and dated August 2026 which identifies that there is strong underlaying demand for child care places in the area. The Executive Summary states:

> *Business Geographic believes there is a strong need for additional childcare in The Gap to address existing imbalances and support future demand.* ***It's estimated The Gap could support an additional 130-170 places by 2031, whilst maintaining a healthy average occupancy rate of 75%.***
>
> *The proposed development at the subject site, offering 94 places, is considered an appropriate response to this need. Its location next to The Gap State School and near other schools is ideal, and as its proximity to major arterial roads (Waterworks Road and Settlement Road), offers a high degree of convenience and amenity for families.*

This needs analysis has also taken into account existing approvals (but not constructed) in the local area.

Given the proposed childcare centre seeks a total of 94 places which is well below the future need of the local community it is therefore demonstrated that the centre will provide a service that fulfills a demonstrable need of the community. As shown, there is a potential need for between 130-170 child care places by 2031, at which time the centre is likely to be constructed and fully operational. Even with the proposed centre open there is a need for additional childcare places in the local community to support local families.

Residential Amenity and Privacy

The centre has been designed to take into consideration surrounding residential properties, with the centre having minimum setbacks of 7m to the northern property boundary and 21m to the eastern property boundary, providing significant separation distances between the centre and adjoining properties, which are also separated largely by landscape screening and deep planting areas.

Significant landscape screening will be provided along the northern portion of the site with a 4m wide deep planting landscape setback, which is double the required 2m landscape setback under the planning scheme.

As a result of Councils information request – the proposal plans were amended to remove all large upper-level windows which had the potential to overlook adjoining properties. As shown in the below figure the windows have been reduced in size and provided with a minimum sill height of 1.5m to provide privacy and reduce the potential for overlooking onto neighbouring properties.

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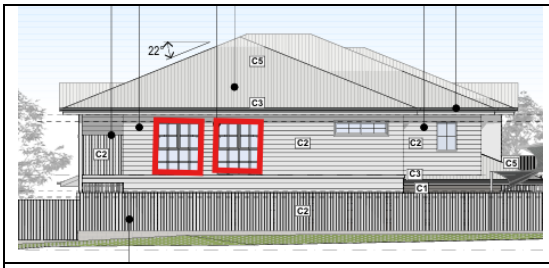
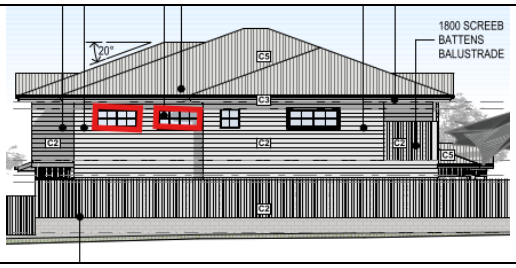
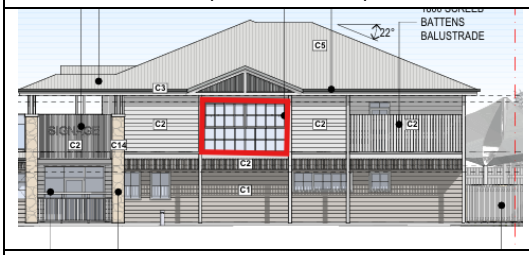
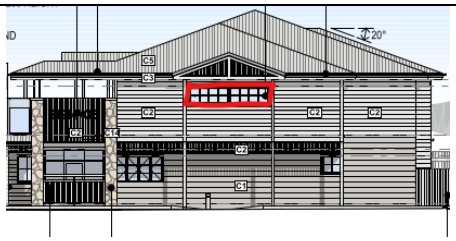
<tr><td></td><td>
</td></tr>
<tr><td>North Elevation (as submitted)</td><td>North Elevation (as submitted)</td></tr>
<tr><td>
</td><td></td></tr>
<tr><td>Eastern Elevation (as submitted)</td><td>Eastern Elevation (amended)</td></tr>
</table>

Please note: CCTV will only be used within the site and can be managed through appropriate conditions on any future development approval.

Bin and refuse areas

Please refer to the *Elevations 3 – Bin Enclosure* as prepared by Raunik Design Group and dated 14/08/2026 which shows the proposed bin enclosure which is roofed and solid walls to enclose the bin storage area and therefore minimise any potential impacts on adjoining sensitive land uses.

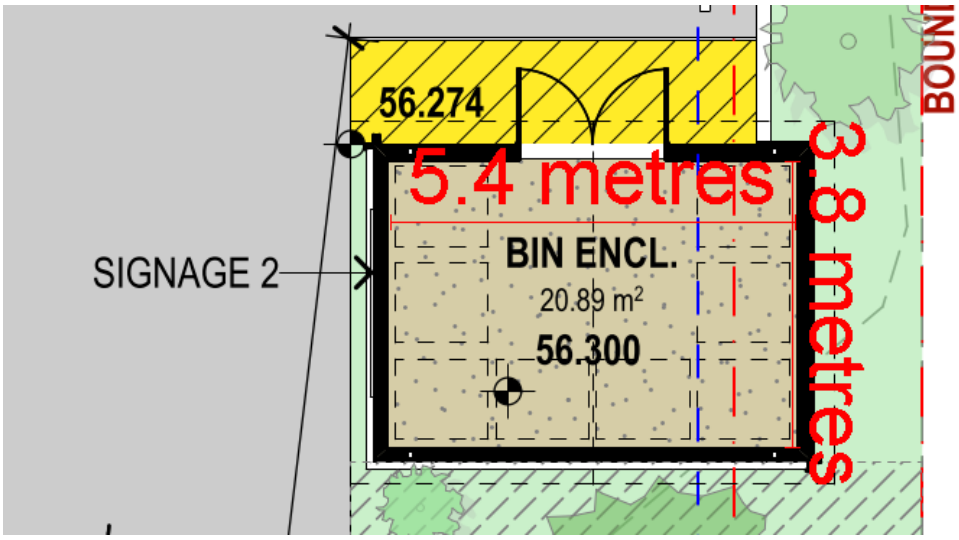
Council has consistently required:

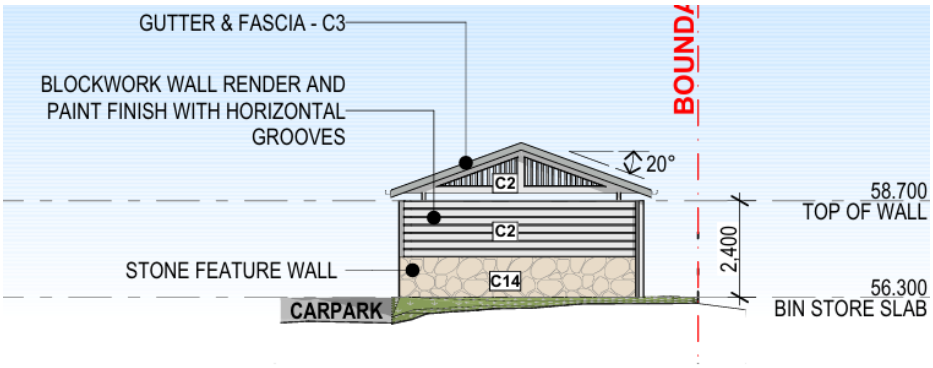
- Onsite refuse collection (given the site is located on an arterial road)
- Bin storage are to be located away from the Waterworks road frontage (Council comments from pre-lodgement minutes – '*It is considered that the location of the bin area at the front boundary is not appropriately located to mitigate adverse impacts on visitors to the proposed development and on the public realm.*')

Given the site is located on an arterial road – onsite waste collection is required by Council with the refuse

vehicles having to enter and leave the site in a forward direction.

The bin storage area is located to improve the streetscape/public realm, minimise impacts on adjoining neighbours and to enable onsite waste collection without interrupting the flow of traffic on Waterworks Road.





SOUTH ELEVATION
1:200

'Elevations – 3 Bin Enclosure Plan' 22104_DA-220_B, provides full elevations of the proposed bin enclosure.

The requirement for onsite waste collection times between the hours of 7am – 6pm during the hours of operation. Conditions relating to the requirement for a bin washdown facilities, and drainage of the bin storage area are expected with any approval issued by Council.
The bin storage area is screened from adjoining residential lots by landscaping and a 1.8m high acoustic fence.

Acoustic Impacts

Please refer to the Noise Assessment Report, Rev No. 1 as prepared by Noise Measurement Services and dated 25/08/2026 which has undertaken onsite noise measurements to determine background noise levels and to assess the impact of the childcare centre on nearby sensitive receptors.
Recommendations within the acoustic report require the development to install acoustic fencing at both ground and first floor to ensure the development does not affect the ongoign residential amenity of those houses surrounding the site.

All mechanical ventilation will be appropriatley screened with the majority of AC units located in the draying and services area on the northern elevation of the building (which is located behind an acoustic fence).



Figure 1: Recommended Acoustic Fence locations onsite

The Noise Impact Assessment has shown that all noise from outdoor play areas and from within the site is within acceptable limits and as a result will not result in a detrimental impact on surrounding properties – where the recommendations of the report are adhered to.

Where the neighbouring The Gap State School has children filtering around the school – without any acoustic attenuation – the proposed child care centre will have acoustic attenuation measures installed to ensure outdoor play and noise emissions are managed.

Safety and location of driveway crossover

Vehicular access to the site has been addressed in the Traffic and Transport Assessment as prepared by Geleon traffic engineers. The driveway crossover will be constructed in accordance with the BCC Standard Drawing BSD-2021 and will include pedestrian continuity treatment, and tactile surface ground indicators.

The detailed design and construction design of the driveway crossover is expected to be conditioned as part any future approval.

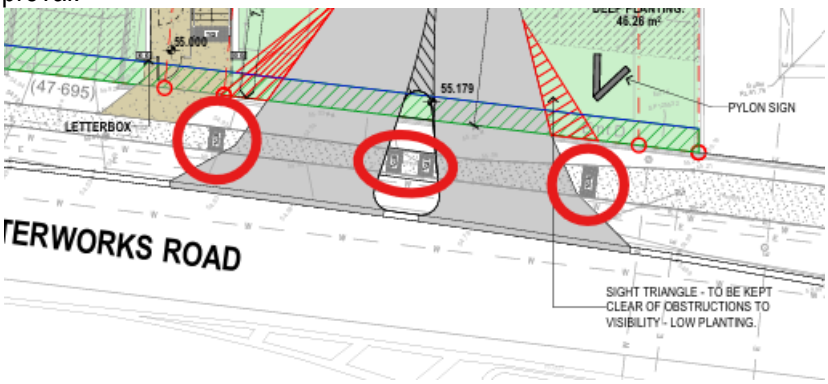


Figure 2: Crossover detail - Complies with BCC Standard Drawing BSD-2021

Concerns have also been raised in relation to the proximity of the crossover and existing bus stop adjacent to The Gap State School. The driveway crossover has been located as far as practicable from the bus stops, and as shown below the existing crossover into the school car park is the only bus stop that has the potential to conflict with the safety and passage pf pedestrians.



Figure 3: Site access in relation to Waterworks Road bus stop

Stormwater and drainage

The Stormwater Management Plan shows that all stormwater from the site will be collected internally and discharged to Waterworks Road via an underground detention and treatment tank. *Post Development Catchment Plan* PEG1158-DA-SK02 Rev C is replicated below showing the internal stormwater catchment, treatment and discharge location. **The result of the proposed stormwater treatment system is that there will be less stormwater runoff from the site onto adjoining properties post development.**

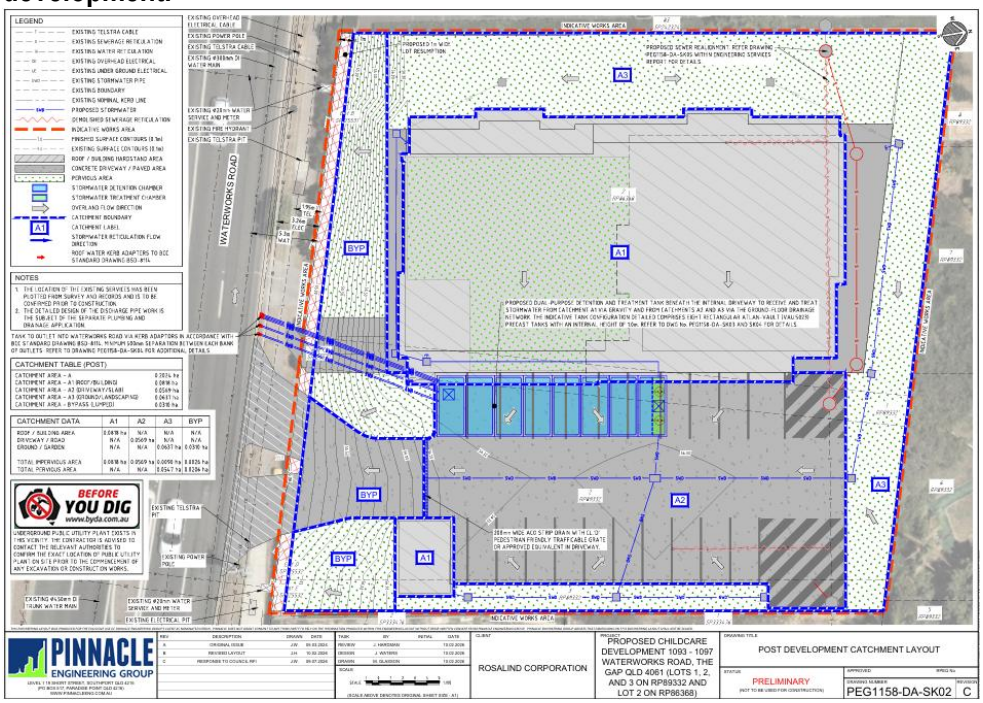


Figure 4: Post Development Catchment Plan PEG1158-DA-SK02 Rev C

Please refer to the 'Site Based Stormwater Management Plan' as prepared by Pinnacle Engineering Rev 3 and dated July 2026 for further information.

Inadequate fencing and acoustic detail

Submissions have raised issues with the fencing details provided being 'insufficient'. The submitted plans have been very clear in regards to the height, materials and acoustic performance of fencing along the property boundaries. Reference should be made to the proposal plans which clearly state the fence to be a '1800 height lapped, dressed and painted timber fence' – this will be constructed as an acoustic fence in accordance with the requirement of the acouctic report which requires the fence to achieve a density of not less than 12.5 kg/m^2.



Figure 5: Fencing detail and material - Elevations Plans

Further, the landscape setbacks comply with the Child care centre code –AO10.1 of the Child Centre Code which states:

> *Development provides a 2m high acoustic fence and a minimum 2m wide landscaped buffer along any boundary adjoining land in a zone in the Residential zones category.*

Although a 4m continuous deep planting zone for the full width of the rear boundary (northern interface) is not required under the Child Centre Code – this has been extended from the previously compliant 2m landscape strip as requested by Council (to 4m), with all structures, during areas etc removed from within the 4m setback.
A small portion of the turning bay extends into this 4m setback (on the north-eastern corner of the site – however this turning area is provided to allow for occasional refuse vehicle turning and will not have a detrimental impact on the residential amenity surrounding the site due to infrequent use and the generous deep planting areas provided along the northern boundary.

Limitations to future adjoining dwellings or construction requirements

A single submission has raised a query in relation to the construction of dwellings on adjoining lots and any additional requirements for construction of future dwellings on adjoining properties. An approval granted for a child care centre would not result in any additional building or construction requirements for a dwelling house that is to be constructed on an adjoining property.

Vegetation Screening to northern boundary
Concerns are raised in relation to the retention of vegetation onsite and future landscape screening, whereby submitters should refer to the '*Landscape Concept Plans'* as prepared by GS Design and dated 26/08/2026 which demonstrate that significant deep planting has been provided to screen the development from adjoining neighbours. The site achieves the required 15% deep planting area required under 'The Gap neighbourhood plan code' which is greater than the remainder of Brisbane with a 10% requirement which will ensure the retention of a green and leafy neighbourhood. Conditions are anticipated requiring a minimum of 25% of trees capable of growing above the height of the building eaves at maturity with a final detailed planting plan to be submitted as part of future Operational Works application for private landscaping. With large areas dedicated to deep planting along the northern boundary of the site the trees within these areas at maturity will provide significant screening of the development and car parking area when viewed from properties within Yuruga Street.

Should you require any further information, please do not hesitate to contact me on the number below.

Regards,



Luke Munro
Town Planner

PLACE CREATION

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